

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	CHAPTER 11
MONTCO OFFSHORE, INC., et al ¹	§	CASE NO. 17-31646
	§	JUDGE ISGUR
DEBTORS	§	JOINTLY ADMINISTERED

**JOINDER OF BOLLINGER FOURCHON, LLC TO OCEANEERING
INTERNATIONAL, INC.'S EMERGENCY MOTION FOR ENTRY OF ORDER
PURSUANT TO 11 U.S.C. § 1121(d) TERMINATING DEBTORS' EXCLUSIVE PERIOD
TO FILE CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF**

THIS MOTION SEEKS ENTRY OF AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE. A HEARING WILL BE HELD ON THIS MATTER ON NOVEMBER 29, 2017 AT 2:00 P.M. (CT) BEFORE THE HONORABLE MARVIN ISGUR, 515 RUSK STREET, COURTROOM 404, HOUSTON, TEXAS 77002

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

Bollinger Fourchon, LLC ("Bollinger"), a creditor of Montco Offshore, Inc. ("MOI") and Montco Oilfield Contractors, LLC ("MOC", together with MOI, the "Debtors"), and appearing herein through undersigned counsel, hereby submits this Joinder to Oceaneering International,

¹ The Debtors in these chapter 11 cases, together with the last four (4) digits of each Debtor's federal tax identification number, are Montco Offshore, Inc. (1448) and Montco Oilfield Contractors, LLC (9886). The mailing address for the Debtors, solely for purposes of notices and communications, is 17751 Hwy 3235, Galliano, Louisiana 70354.

Inc.’s (“Oceaneering”) Motion to Terminate Exclusivity Period pursuant to 11 U.S.C. §1121(d) (Doc. 639).

For the reasons more fully set forth in Oceaneering’s Motion to Terminate Exclusivity Period, cause exists to terminate the Debtor’s Solicitation Exclusivity Period and to deny the Debtor’s Motion for Entry of an Order Extending Exclusivity Period Pursuant to Bankruptcy Code 1121 (Doc. 605) filed on November 13, 2017, the fourth such motion filed by the Debtors.

Because the Debtors are no longer seeking to confirm their Plan—rather they are seeking to liquidate all assets (see Doc. 637)—there is cause to end the Debtors’ exclusivity period.

Bollinger hereby joins in Oceaneering’s Motion to Terminate Exclusivity Period, incorporates herein by reference the arguments contained therein, and requests that an order be entered in the form attached to Oceaneering’s Motion to Terminate Exclusivity as Exhibit A thereto.

November 28, 2017

Respectfully submitted:

GORDON, ARATA, MONTGOMERY,
BARNETT, McCOLLAM, DUPLANTIS &
EAGAN, LLC

/s/ Michael E. Landis

Stephen L. Williamson (La. Bar No. 8316)
Michael E. Landis (La. Bar No. 36542)
201 St. Charles Avenue, 40th Floor
New Orleans, Louisiana 70170
Telephone: (504) 582-1111
Facsimile: (504) 582-1121
E-mail: swilliamson@gamb.law
E-mail: mlandis@gamb.law

Attorneys for Bollinger Fournchon, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document has been served electronically upon all parties of record via the ECF noticing system this 28th day of November, 2017.

/s/ Michael E. Landis
